

**REMARKS**

Applicant requests reconsideration and allowance of the present application in view of the foregoing amendments and the following remarks.

Claims 1-12 are pending in the present application. Claims 1, 5, and 9 are the independent claims.

Claims 1, 5, and 9 have been amended. No new matter has been added.

Claims 1-12 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Rui et al. in view of U.S. Patent No. 6,430,455 (Rebello et al.). All rejections are respectfully traversed.

It is respectfully submitted that independent claims 1, 5, and 9 have been amended to patentably define over the asserted citations.

Independent claims 1, 5, and 9 recite, inter alia, creating load region data for specifying a load applying region in a master model, the load applying region being a portion of the master model to which a load will be applied, the load being a mechanical load.

However, Applicant respectfully submits that neither Rui et al. nor Rebello et al. teaches or suggests at least the aforementioned features. Thus, without conceding the propriety of the asserted combination, it is submitted that the asserted combination is likewise deficient.

Rui et al. relates to artificial neural network (ANN) based short term load forecasting in power systems. The article surveys ANN-based short-term load forecasting (STLF) models for power systems. One of the ANN-based STLF models discussed is a back-propagation (BP) network structure. At column 1 on page 2 of the Rui et al. document, various deficiencies in BP networks are discussed. However, Rui et al. is silent as to the aforementioned features of independent claims 1, 5, and 9. For example, Rui et al. does not teach or suggest creating data regarding a mechanical load.

Rebello relates to managing how current files of a product are at the time of release and discusses using programs stored in a CAD/CAM system 12 to generate a master model 20 from a plurality of model features stored in a database 22. (Rebello, Col. 2, lines 45-48; FIG. 1). Rebello goes on to discuss using a data population and extraction program to extract attributes from model features used to make the master model and to populate a data file (e.g., a drawing 24) with the extracted attributes. (Rebello, Col. 2, lines 48-52; FIG. 1). The Office Action contends that the drawing 24 is where the load data is located. (Office Action, page 4).

However, even assuming arguendo that the Office Action's contention is accurate, the Rebello drawing 24 does not, for example, specify a portion of the master model to which a load will be applied or creating data regarding a mechanical load, as recited in independent claims 1, 5, and 9.

Still further, it is respectfully submitted that Rui et al. is nonanalogous art. Rui et al. relates to load forecasting on neural networks. It is respectfully submitted that such art is not even reasonably pertinent to the problems addressed by the claimed invention. Thus, a rejection under 35 U.S.C. § 103 based on Rui et al. is improper. See Manual of Patent Examining Procedure, Section 22141.01(a).

Accordingly, favorable reconsideration and withdrawal of the rejection of independent claims 1, 5, and 9 under 35 U.S.C. § 103 are respectfully requested.

In view of the foregoing, Applicant respectfully submits that the independent claims patentably define the present invention over the citations of record. Further, the dependent claims should also be allowable for the same reasons as their respective base claims and further due to the additional features that they recite. Separate and individual consideration of the dependent claims is respectfully requested.

Applicant believes that the present Amendment is responsive to each of the points raised by the Examiner in the Official Action. However, if there are any formal matters remaining after this response, the Examiner is requested to telephone the undersigned to attend to such matters.


There being no further outstanding objections or rejections, it is submitted that the present application is in condition for allowance. An early action to that effect is courteously solicited.

If there are any additional fees associated with filing of this Amendment, please charge the same to our Deposit Account No. 19-3935.

Respectfully submitted,

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